

# **TECHNICAL REVIEW DOCUMENT FOR RENEWAL OF OPERATING PERMIT 95OPDE077**

to be issued to:

Shafer Commercial Seating, Inc.  
Denver County  
Source ID 0310910

Prepared by Geoffrey Drissel  
June, 2008

## **1. Purpose**

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued September 1, 1998. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted June 3, 2008, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

## **2. Source Description**

This source is primarily classified as a commercial wood furniture manufacturing facility under Standard Industrial Classification 2599. Ten percent (10%) of Shafer's overall manufacturing is done on site. The remaining 90% is imported from outside of the country. Their mill operation consists of various saws, sanders, etc. The finishing process requires five (5) paint spray booths for different steps in the process.

This facility is located in the Denver Metro Area. The Denver Metro Area is classified as attainment/maintenance for particulate matter less than 10 microns in diameter (PM10) and carbon monoxide (CO). Under that classification, all SIP-approved requirements for PM10 and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act. The Denver Metro Area is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.16.

This facility is categorized as a NANSR minor stationary source (Potential to Emit of VOC or NOx < 100 Tons/Year). The source is also currently considered to be a minor source for purposes of Prevention of Significant Deterioration (PSD) regulations (Potential to Emit < 250 tpy). Facility-wide potential and actual emissions are as follows:

<u>Pollutant</u>	<u>Potential to Emit (tpy)</u>	<u>Actual (tpy)</u>
VOC	90.0	9.1

Potential to Emit is based on the maximum allowable emissions as defined by the operating permit. Actual emissions are based on the VOC levels reported in the most recent APEN submittal. This facility is not subject to the requirements of Section 112(r) of the Clean Air Act Amendments of 1990 based upon the Potential material usage as reported in the Title V application.

### **3. Discussion of Modifications Made**

#### *Source Requested Modifications*

The source requested the following changes to the permit in their renewal application:

#### **Page following Cover Page**

Change the Facility Contact Person

#### **Section II, Condition 1.5.2**

Delete the opacity language that references furnace or incinerator operations that are no longer in use.

#### *Other Modifications*

In addition to the requested changes, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well

as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Shafer Operating Permit:

**Section I**

Condition 1.1 was revised to reflect the non-attainment status for the area.

Condition 1.4 was revised to reflect the most recent references.

Condition 3 as revised to reflect the most current language regarding the PSD status of the source.

**Section III – Permit Shield**

The shield citation was updated to reflect the most current reference.

**Section IV – General Conditions**

The General Conditions section was replaced with the most current version.

**Appendices**

Appendices B and C were replaced with the most current versions.

The EPA addresses in Appendix D were updated.